

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

Department of Environmental Management  
DIVISION OF SITE REMEDIATION  
291 Promenade Street  
Providence, R.I. 02908-5767

12 December 1995

Mr. Philip Otis, P.E., Remedial Project Manager  
US Department of the Navy, Northern Division  
Code 18, Mail Stop #82  
10 Industrial Highway  
Lester, PA 19113-2090

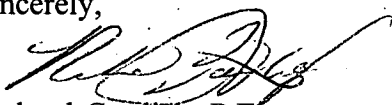
RE: Action Memorandum For Study Area 4  
NCBC Davisville, RI  
Submitted 29 November 1995

Dear Mr. Otis;

The Rhode Island Department of Environmental Management (RIDEM), Division of Site Remediation has reviewed the above referenced document. Comments are attached.

If you have any questions or require additional information please call me at (401) 277 3872 ext. 7138.

Sincerely,



Richard Gottlieb, P.E.  
Principal Sanitary Engineer

cc: W. Angell, DEM DSR  
C. Williams, EPA Region 1

**Comments For:**

**Action Memorandum For  
Study Area 4 at  
NCBC Davisville, RI  
27 November 1995**

- 1. Page 13, Section 2.7, Enforcement;  
Paragraph 1, Last Sentence.**

*Therefore, enforcement strategies do not apply to this removal action.*

The State of Rhode Island, at this time, has no reason to initiate enforcement actions. If the Navy were to not comply with Rhode Island rules and regulations enforcement actions could be undertaken by the State. The above sentence should be removed from the document.

- 2. Table 2-5, Federal and State Action-Specific ARARs and TBCs**

Please note that Rhode Island General Laws, Chapter 18.9, Refuse Disposal, and in particular 23-18.9-5 (Disposal of Refuse at Other than a Licensed Facility) is an ARAR since more than three cubic feet of material is present at the site. This should be added as an ARAR to this Table. In addition Rhode Island Solid waste regulations should be observed.